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Docket No. C-2021-3024569

Hearing Date: January 3, 2023

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**FSN's Answer with New Matter  
to Formal Complaint**



Eckert Seamans Cherin & Mellott, LLC  
213 Market Street  
8<sup>th</sup> Floor  
Harrisburg, PA 17101

TEL: 717 237 6000  
FAX: 717 237 6019

Kristine E. Marsilio  
717.237.6037  
kmarsilio@eckertseamans.com

May 3, 2021

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Kathleen C. Babyak v. Full Service Network, LP  
Docket No. C-2021-3024569

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Full Service Network, LP's ("FSN") Answer and New Matter in the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

*Kristine E. Marsilio*

Kristine E. Marsilio

KEM/lww

Enclosure

cc: Cert. of Service w/enc.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kathleen C. Babyak,	:	
	Complainant	: Docket No. C-2021-3024569
	:	
v.	:	
	:	
Full Service Network, LP,	:	
	Respondent	:

---

**NOTICE TO PLEAD**

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**To: Kathleen C. Babyak**  
149 Oak Ridge Road  
Acme, PA 15610

You are hereby notified that a reply to the **New Matter** in the enclosed Answer with New Matter of Full Service Network, LP (“FSN”) must be filed within 20 days of the date of service.

All pleadings, such as a reply to New Matter, must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for the Authority the Administrative Law Judge (“ALJ”), if any, presiding over this proceeding.

File with:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

With a copy to:

Deanne O’Dell, Esquire  
Kristine E. Marsilio, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
dodell@eckertseamas.com  
kmarsilio@eckertseamans.com

*Kristine E. Marsilio*

---

Kristine E. Marsilio, Esquire

Attorney for  
*Full Service Network, LP*

Date: May 3, 2021

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kathleen C. Babyak,	:	
	Complainant	: Docket No. C-2021-3024569
	:	
v.	:	
	:	
Full Service Network, LP,	:	
	Respondent	:

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**FULL SERVICE NETWORK, L.P  
ANSWER AND NEW MATTER TO COMPLAINT**

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Pursuant to 52 Pa. Code §§ 5.61 and 5.62 and the Secretarial Letter dated March 31, 2021 issued in the above-captioned proceeding, Full Service Network, LP (“FSN”) submits this Answer and New Matter to the Formal Complaint of Kathleen C. Babyak (“Complainant” or “Ms. Babyak”). Complainant asserts: 1) that she has had repeated service outages; 2) that she is being forced to switch from a National Plan to a Nationwide Calling Plan; 3) that “upper management” has ordered the dropping of Auto-Pay on her account, and Auto-Pay was dropped without prior notice resulting in FSN issuing her a suspension notice; and 4) poor customer service.

As explained in more detail below, these assertions all lack merit. Further, Ms. Babyak’s Formal Complaint constitutes an insufficient specificity of pleading and/or a legal insufficiency of pleading. For these reasons, contemporaneous with this filing, FSN is filing Preliminary Objections, seeking to have the Formal Complaint dismissed on these grounds. In further support of its position, FSN avers as follows:

## ANSWER

1. To the best of FSN's knowledge and belief, the name and contact information for the Complainant is accurate.

2. It is admitted that the full name of the Company is Full Service Network, LP. The PO Box mailing address provided by the Complainant is the one FSN's banks uses to process payments. FSN's address for purposes of customer service is Full Service Network, U.S. Steel Tower, 30th Floor, 600 Grant Street, Pittsburgh, PA 15219.

3. It is admitted that FSN resells telecommunications services to the address identified in the Formal Complaint. By way of further answer, as a wholesale customer of Verizon Pennsylvania Inc. and Verizon North, Inc. (collectively, "Verizon"), FSN purchases the competitive services of Verizon at a wholesale discount and then resells them to FSN's retail customers.<sup>1</sup>

4. The allegations are admitted/denied consistent with the information below. Any factual averments not specifically addressed in the responses below are denied.

### **Repeated Service Outages**

- (a) FSN is a certificated Competitive Local Exchange Carrier, authorized by the Pennsylvania Public Utility Commission ("Commission") to provide local exchange telecommunications services to customers within the Verizon service areas in Pennsylvania.<sup>2</sup> FSN is also a wholesale customer of Verizon and purchases the competitive services set forth in Verizon's Price List and Product Guide at a wholesale discount and then resells them to FSN's retail customers. FSN resells the competitive services *provided by Verizon* to the subject premises. As such, Verizon as the actual provider of Ms. Babyak's telecommunication services, owns the utility poles and wires, and Verizon is responsible for responding to service outages. FSN

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<sup>1</sup> See 47 U.S.C. §§ 251(b)(1) and (c)(4).

<sup>2</sup> *Application of Full Service Network LP for approval to offer, render, furnish or supply telecommunication services as a Competitive Local Exchange Carrier reseller to the public in the service territories of Verizon Pennsylvania Inc. and Verizon North Inc. within the Commonwealth of Pennsylvania, Docket No. A-311406.*

does not have access or permission to address a problem pertaining to Verizon's telephone poles or wires.<sup>3</sup>

- (b) In or around late January 2019, Ms. Babyak reported service issues to FSN. FSN notified Verizon of Ms. Babyak's reported concerns. To the best of FSN's knowledge and belief, Verizon took approximately ten days to fix the telephone wire and address the problem. Further, it is FSN's understanding that Verizon resolved the problem in its entirety on December 2, 2020. Ms. Babyak has not reported any service issues since that time.
- (c) As indicated in the Formal Complaint, FSN gave Ms. Babyak credit for the days in which she was out of service.
- (d) FSN specifically denies that it has, in any way, "harassed" Ms. Babyak for insisting that the service outages be investigated.

### **Calling Plan**

- (e) As to Ms. Babyak's complaint that she is being forced to switch from a National Plan to a Nationwide Calling Plan, FSN filed a tariff supplement, which was approved by the Commission, in which FSN discontinued certain residential pricing packages, including its "National Plan."<sup>4</sup> FSN provided Ms. Babyak notice that her Plan was being discontinued and indicated that she would be placed on FSN's Nationwide Calling Plan at a price of \$59.95/month beginning with Ms. Babyak's February 13, 2021 invoice. Due to Ms. Babyak's expressed concern with the new rate, FSN has not, to this date, increased her rate. Further, due to this concern and the others raised in Ms. Babyak's Formal Complaint, FSN recommended that Ms. Babyak switch to Verizon to receive local exchange telecommunications services directly. To this date, Ms. Babyak has not requested a switch in providers.

### **Auto-Pay**

- (f) As to Ms. Babyak's complaints regarding Auto-Pay, FSN inadvertently failed to process Ms. Babyak's Auto-Pay for her bill that was due on November 24, 2020. As a result, Ms. Babyak received a past due letter. FSN rectified the problem. FSN did not charge Ms. Babyak any late charge fees as a result of this issue, nor did FSN suspend Ms. Babyak's service. Additionally, FSN has continued to use Auto-Pay

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<sup>3</sup> See 47 U.S.C. §§ 251(b)(1) and (c)(4). Federal law imposes on incumbent local exchange carriers, like Verizon, the duty to offer for "resale at wholesale rates any telecommunications service that the carrier provides at retail to subscribers [...]" *Id.* The current wholesale rates for the resale of Verizon's competitive services were established in 2005. *Wholesale Rate for Resale of Telecommunications Provided by Verizon Pennsylvania Inc. and Verizon North Inc.*, Docket No. R-00038516, Final Order (March 4, 2005).

<sup>4</sup> See *Full Service Network LP Revisions to Competitive Local Exchange Service Tariff*, Docket No. R-2020-3023436, Secretarial Letter (Feb. 11, 2021).

for Ms. Babyak's account, and this error did not affect Ms. Babyak's credit score in any way.

**Customer Service**

- (g) FSN specifically denies that it has provided poor customer service to Ms. Babyak, or any other customer. Regarding Ms. Babyak's claims that she received a recording when attempting to contact FSN, FSN experienced some staffing issues during the COVID-19 pandemic. On a handful of occasions, FSN utilized a system of addressing customer calls, wherein the customer would leave a message, and FSN would return the call. This system was utilized on a limited basis, primarily when employees were on their lunch break. FSN denies that it failed to return any of Ms. Babyak's calls.

**December 2, 2020 Billing Statement**

- (h) While not identified as an issue in her Formal Complaint, Ms. Babyak expresses some confusion over the charges in her December 2, 2020 Billing Statement. *See* Formal Complaint at pdf pages 14-17. FSN denies that the charges on the December 2, 2020 Billing Statement do not "add up." The Billing Statement is a document which speaks for itself. By way of further answer, as indicated in the Billing Statement, the late payment fees of \$10 and \$0.32 come directly from FSN's Facilities-Based Interexchange Tariff ("FBIT Tariff") and Competitive Local Exchange Carrier Reseller and Facilities Based Tariff ("Local Tariff"), respectively. FBIT Tariff at 17; Local Tariff at 10. FSN applied a credit in the amount of these late payment charges to Ms. Babyak's account.

5. It is denied that Complainant is entitled to the requested relief. FSN incorporates its responses to Paragraph 4 herein. By way of further answer, FSN makes its best efforts to coordinate with and communicate any service outages to Verizon. FSN does not have reasonability or authority over Verizon repairs.

6-10. No response is required to Paragraphs 6 through 10 of the Formal Complaint. To the extent such allegations are deemed factual, the factual allegations in Paragraphs 6 through 10 of the Formal Complaint are admitted or denied consistent with Paragraphs 1 through 5 of this Answer and the next sentence of this Paragraph (together with the footnote to that sentence). By way of further answer, FSN admits that this Complaint is related to a prior

decision of the Commission's Bureau of Consumer Services ("BCS").<sup>5</sup> FSN is without knowledge as to whether the BCS investigator, Nathan Prough, indicated to Ms. Babyak that the Commission would fine FSN and, therefore, FSN denies same. The BCS resolution, dated January 4, 2021, provides as follows (emphasis added):

Verbal Close: Customer Kathleen Babyak returned call. Reviewed complaint and Company report with customer. Customer confirmed that a box was replaced outside her house after the PUC complaint was filed, but she has had multiple issues since then. Customer was still very upset with Company and would like the lines replaced for a permanent fix. **Informed customer that FSN provides her service but Verizon is responsible to maintain the lines.** Informed customer that the PUC cannot permanently fix her issues at the informal level and referred her to formal complaint process. Customer understood and thanked PUC for helping. Customer gave permission to close the case.

#### NEW MATTER

11. FSN incorporates paragraphs 1-10 herein.
12. The Formal Complaint fails to state a claim upon which relief can be granted.
13. The Formal Complaint, in whole or in part, constitutes an insufficient specificity of pleading.
14. The Formal Complaint, in whole or in part, constitutes a legal insufficiency of pleading.

#### CONCLUSION

WHEREFORE, Full Service Network, LP respectfully requests that the Commission (a) dismiss the Complaint; and, (b) grant any other relief deemed appropriate. Notwithstanding FSN's requests for dismissal of the Complaint, FSN is willing to work with the Complainant to resolve this matter and therefore requests that the Office of Administrative Law Judge issue an "Interim

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<sup>5</sup> BCS Case No. 3775768.

Order Setting Resolution Conference” directing the parties to hold a conference about resolving the case.

Respectfully submitted,

*Kristine E. Marsilio*

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Deanne O’Dell, Esquire  
Attorney ID # 81064  
Kristine E. Marsilio, Esquire  
Attorney ID #316479  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8th Floor  
Harrisburg, PA 17101  
(717) 255-3744 (phone)  
(717) 237-6019 (fax)  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[kmarsilio@eckertseamans.com](mailto:kmarsilio@eckertseamans.com)

Date: May 3, 2021

Attorneys for Full Service Network, LP

Verification

I, CHRISTOPHER HONEYWELL am the EVP for Full Service Network, LP, ("FSN") and I hereby state that the facts set forth in the foregoing Answer and New Matter are true and correct to the best of my knowledge, information and belief and that I expect FSN to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date:

4-30-2021

Christopher Honeywell, EVP

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of the foregoing Answer and New Matter upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Federal Express**

Kathleen C. Babyak  
149 Oak Ridge Road  
Acme, PA 15610

**Via Email Only**

Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
2nd Floor, L-M West  
400 North Street  
Harrisburg, PA 17120  
bobbwillia@pa.gov

Date: May 3, 2021

*Kristine E. Marsilio*

Kristine E. Marsilio, Esquire  
Attorney for the Full Service Network, LP

Excerpt of FSN Tariff –  
Previous Rates on 4<sup>th</sup> Revised Page 42

**Full Service Network LP**

**Competitive Local Exchange Carrier**

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**SECTION 3 - SERVICE COMPONENTS & PRODUCT DESCRIPTIONS (CON'T)**

E. Rates (Con't)

2.	1-Rate Package Pricing:		[c]
	Residential 1-Rate Level 1*	Rates	
	includes Dial Tone	29.99/month	[c]
	unlimited voice Local Calling, and these features:		
	Call Waiting		
	Call Forwarding		
	Three Way Calling		
	Caller ID Deluxe		
	Repeat Dial		
	Return Call		
	Call Block		
	One Touch Dialing		
	Anonymous Call Rejection		
	Call Waiting Tone Block		
	Residential 1-Rate Level 2	51.24/month	[i]
	includes Dial Tone		
	unlimited voice Local Calling, Regional Toll Calling and these three features: Call Waiting, Caller ID Deluxe, and Voicemail		
	Residential 1-Rate Level 3	24.13/month	[c]
	includes Dial Tone		[c]
	unlimited voice Local Calling & Metro Toll Calling		[c]
	Residential 1-Rate Level 4	59.95/month	
	includes all items of Levels 1 plus		
	unlimited voice Flat Regional Calling		
	Business 1-Rate	19.95/month	
	includes 3 cent per call local calls		

\*No longer available to new customers after July 31 2015 [c]  
[c]

\*\*All monthly rates are per line. Plans and individual features are subject to Company's technical ability to provide a plan or feature in a given area. Due to technical limitations, not all plans or features are available in all areas. Customer should contact Company for availability. No credit or pro-rate is offered for a Customer in a locality not equipped to offer one or more features. Voice calls are unlimited.

**Excerpt of FSN Tariff – Current Rates on 5<sup>th</sup>  
Revised Page 42, effective January 24, 2021**

December 23, 2020

*Via Electronic Filing*

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
Post Office Box 3265  
Harrisburg, PA 17120-3265

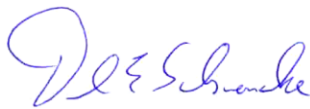
Dear Secretary Chiavetta:

Enclosed please find Tariff Supplement Number 41 for Full Service Network LP's PA P.U.C. Tariff No. 1.

This supplement discontinues two optional residential pricing packages.

Thank you.

Sincerely,



David E Schwencke  
President

**Full Service Network LP**

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FULL SERVICE NETWORK LP  
**COMPETITIVE LOCAL EXCHANGE CARRIER  
RESELLER AND FACILITIES BASED TARIFF**

Regulations and Schedule of Charges within the Commonwealth of Pennsylvania  
For the service areas noted below

The Company will mirror the exchange area boundaries as stated in the tariffs of Verizon Pennsylvania Inc. Telephone Pa. P.U.C. No. 180A, 182, 182A, 185B and 185C; Verizon North Retain Inc. Telephone Pa P.U.C. No. 1, 3, 5, and 6; Windstream Pennsylvania, Inc. Telephone Pa P.U.C. No. 7; United Telephone Company of Pennsylvania d/b/a Embarq Pa. P.U.C. No. 27; and Consolidated Communications of Pennsylvania Company Pa P.U.C. No. 11.

The Company's tariff is in concurrence with all applicable State and federal Laws (including but not limited to, 52 Pa Code, 66 Pa. C.S. and the Telecommunications Act of 1934 as amended) and with the Commission's applicable Rules and Regulations and Orders. Any provisions contained in this Tariff that are in conflict with the foregoing will be deemed inoperative and superseded.

**Full Service Network LP**

**Competitive Local Exchange Carrier**

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**LIST OF CHANGES**

This filing proposes the following:

5<sup>th</sup> Revised Page 42

Discontinuance of the Level 1 and Level 2 pricing

**Full Service Network LP**

**Competitive Local Exchange Carrier**

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Check Sheet

The Title Page and those shown are effective as of the date shown. Original and revised pages as named below contain all changes from the original tariff that are in effect on the date thereof.

<u>Pages</u>	<u>Revisions</u>	
1	41	[c]
2	41	[c]
3 through 4	Original	
5	1	
6 through 9	Original	
10	1	
11		
12	1	
13 through 14	Original	
14.1	Original	
15	1	
16	Original	
17	1	
18 through 37	Original	
38	1	
39	Original	
40	Original	
41	17	
42	5	[c]
43	14	
44 through 53	Original	
54	1	
54.1	Original	
54.2	Original	
54.3	Original	
55	Original	
56	Original	
57	1	
58 through 61	Original	
62	2	
63	Original	
63.1	Original	
64	Original	
65	Original	
66 through 70	Original	

**Full Service Network LP**

**Competitive Local Exchange Carrier**

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**SECTION 3 - SERVICE COMPONENTS & PRODUCT DESCRIPTIONS (CON'T)**

E. Rates (Con't)

2. 1-Rate Package Pricing:

Rates

[c]

[c]

Residential 1-Rate Level 2  
includes Dial Tone  
unlimited voice Local Calling, Regional Toll Calling and these  
three features: Call Waiting, Caller ID Deluxe, and Voicemail

51.24/month

[c]

[c]

Residential 1-Rate Level 4  
includes all items of Levels 1 plus  
unlimited voice Flat Regional Calling

59.95/month

Business 1-Rate  
includes 3 cent per call local calls

19.95/month

[c]

\*\*All monthly rates are per line. Plans and individual features are subject to Company's technical ability to provide a plan or feature in a given area. Due to technical limitations, not all plans or features are available in all areas. Customer should contact Company for availability. No credit or pro-rate is offered for a Customer in a locality not equipped to offer one or more features. Voice calls are unlimited.

\*\*\*Internet not a regulated item - included in tariff for information purposes only

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Issued: December 23, 2020

Effective: January 24, 2021

David E Schwencke, President  
600 Grant St Ste 3075 Pittsburgh, Pa 15219



COMMONWEALTH OF PENNSYLVANIA  
 PENNSYLVANIA PUBLIC UTILITY COMMISSION  
 400 North Street, Harrisburg, Pennsylvania 17120

IN REPLY PLEASE  
 REFER TO OUR FILE

February 11, 2021

Docket No. R-2020-3023436  
 Utility Code: 311406

DAVID E SCHWENCKE  
 FULL SERVICE NETWORK LP  
 600 GRANT STREET  
 PITTSBURGH PA 15219

Re: Full Service Network LP  
 Revisions to Competitive Local Exchange Service Tariff

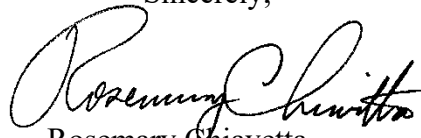
Dear Mr. Schwencke:

Commission Staff reviewed the tariff revisions, referenced below. Suspension or further investigation does not appear warranted at this time. Therefore, in accordance with 52 Pa. Code, the tariff revisions are effective by operation of law according to the effective dates contained on each page, and the case will be closed. However, this does not constitute a determination that the revisions are just, lawful, and reasonable, but only that suspension or further investigation does not appear warranted at this time, and is without prejudice to any formal complaints timely filed against said tariff revisions.

Supplement	Tariff	Description	Filed	Effective
41	1	Discontinue Residential Level 1 and Level 3 Pricing Packages	12/23/2020	01/24/2021

If you are dissatisfied with the resolution of this matter, you may, as set forth in 52 Pa. Code § 5.44, file a petition with the Commission within 20 days of the date of this letter. If you have any questions in this matter, please contact Eric Jeschke, Telco Section, Bureau of Technical Utility Services at (717) 783-3850 or [ejeschke@pa.gov](mailto:ejeschke@pa.gov)

Sincerely,



Rosemary Chiavetta  
 Secretary

cc: Melissa Derr, TUS

**Babyak Monthly Statement  
dated December 2, 2022**

Full Service Network  
PO Box 3495  
Pittsburgh, PA 15230



December 2, 2022 Statement

**Bill Number:** 100  
Services provided by  
Full Service Network L.P.

KATHLEEN BABYAK  
149 OAKRIDGE RD  
ACME, PA 15610

Customer Service: 1-888-347-6000  
Repair Service: 1-888-588-2099

[www.fullservicenetwork.com](http://www.fullservicenetwork.com)

## Account Summary

Previous Balance..... 64.10  
Payments..... 64.10  
New Charges..... 64.10

**Total Amount Due \$64.10**  
**Payment Deducted On or About December 24, 2022**

Payment must be received on or before the indicated due date to avoid a 1.25% late payment charge.

### You're on AutoPay!

Payment will be automatically deducted from your approved checking account on or before the due date.

### Stop Telemarketers Dead in Their Tracks!

To be added to the Pennsylvania Do Not Call list or to renew your listing call 1-888-777-3406. Remember that PA DNC listings expire every 5 years! You can also sign up for the Federal Do Not Call list at <https://www.donotcall.gov/> or by calling 1-888-382-1222. Entries to the Federal DNC list are permanent and do not expire.

**ACCOUNT NUMBER 9003017097**

No need to send payment, you're already signed up for AutoPay - See above for details

KATHLEEN BABYAK  
149 OAKRIDGE RD  
ACME, PA 15610

Amount Enclosed:

**Due on or before December 24, 2022**

**Make Check Payable to: Full Service Network**



**ACCOUNT NUMBER 9003017097**

Full Service Network  
PO Box 3495  
Pittsburgh, PA 15230

9003017097 1 0100



Customer Service: 1-888-347-6000  
Repair Service: 1-888-588-2099  
[www.fullservicenetwork.com](http://www.fullservicenetwork.com)

**KATHLEEN BABYAK 900-3017097**

Bill Number: 100  
Billing Date: Dec 2, 2022

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## Summary of Charges

**Billing Date: December 02, 2022**

Monthly Charges.....	\$43.38
One Time Charges and Credits.....	\$0.00
Partial Month Charges.....	\$0.00
Call Detail Charges.....	\$0.00
Taxes and Surcharges.....	\$20.72
<b>Total Charges This Month.....</b>	<b>\$64.10</b>

## Monthly Charges

**Monthly Charges for 724-547-4097 Period 12-02-22 thru 01-01-23**

Federal Line Cost Charge.....	6.39
Nationwide Calling.....	INCL
Touch Tone Residence.....	INCL
Block Pay Per Call.....	INCL
National Plan.....	36.99

**Total Monthly Charges for 724-547-4097..... \$43.38**

## Taxes And Surcharges

### Taxes and Surcharges

Fed Excise Tax.....	0.19
Gross Receipts Tax.....	2.80
Fed RAS.....	6.32
Regulatory Cost Srch.....	2.99
Pa Sales Tax.....	3.15
Federal Access Recovery Charge (ARC).....	2.10
Nbr Portability Surcharge.....	0.23
911 Surcharge.....	1.65
PIC.....	1.29

**Total Taxes and Surcharges..... \$20.72**



Any questions or concerns about this bill may be directed to our customer service department. Please call before the indicated due date. 1-888-347-6000, or write to: Full Service Network, U.S. Steel Tower, 30th Floor, 600 Grant Street, Pittsburgh, PA 15219.

Rate schedules and instructions on how to verify the accuracy of your bill, along with explanations for any other various applicable charges, can be obtained by calling our local business office at 1-888-347-6000.

This information is required by the Public Utility Commission. "Basic" service includes the line charge, local calling and TOUCH TONE service (if applicable). "Non-Basic" service includes optional services, other than Touch Tone, such as Maintenance agreement for inside wire and does not include toll services.

Basic Charges	\$25.92
Non-Basic Charges	\$17.46
Taxes & Surcharges	\$20.72

The previous pages provide additional details.

Promotional and other service credits maybe forfeited if invoice is not paid on or before the due date.

**Check - ACH Conversion**

When you provide a check as payment, via phone, by web, or by paper, you authorize us either to use information from your check to make a one-time ACH electronic fund transfer from your account or to process the payment as a check transaction. You may provide a facsimile copy of a check as payment and in doing so you authorize us either to use information from your check to make a one-time ACH electronic fund transfer from your account or to process the payment as a check transaction. To avoid duplicate charges from facsimile checks do not also mail the check. If your payment is returned due to "Not Sufficient Funds", "NSF", "Uncollected Funds", or other comparable language, you authorize us to re-process your transaction as a one-time electronic fund transfer from your account and/or to re-process the original paper draft payment as a check transaction. For inquiries, please call 1-888-347-6000. There will be a \$30.00 charge for checks returned by the bank for any reason and we may debit this fee from your account electronically.

## Screenshots of Verizon Portal

https://www22.verizon.com/wholesale/secure/systems/vtag/VTAGMainMenuFrame.jsp - Personal - Microsoft Edge

https://www22.verizon.com/wholesale/secure/systems/vtag/VTAGMainMenuFrame.jsp

**verizon** Help What's New Contact Us Tools Personalize Sign Out

**Verizon Trouble Administration Gateway**  
Welcome **Chris Honeywill**, account number **fulcxh1**

Self Service (Test, etc)  
Trouble Ticket  
Status and History

FULL SERVICE NETWORK  
Trouble Ticket Create  
Multi Trouble Ticket Create  
Trouble Ticket Modify  
Request to Cancel Ticket  
Request Escalation  
Repair Verification

**Work List Filter**

Show: All Search Criteria: ---- Search:

From: Sep 30 2021 To: Sep 30 2021 Requested By:  Refresh

Copyright 2002 Verizon Privacy Policy

Administration Gateway

VTAG - Request Escalation - Personal - Microsoft Edge

https://www22.verizon.com/wholesale/secure/systems/vtag/TACCommonRqstForm.jsp?action=TAEntEscRequest&ESCFlag=true

**Request Escalation**


★ Escalation By:

★ Indicates required field.

Trouble Report Screenshot –  
August 26, 2021

**Trouble Report Details Screen**

Trouble Ticket Information	
<u>Response Code</u>	0000
<u>Response Description</u>	Transaction completed successfully.
<u>Circuit ID or 2-6 Code</u>	7245474097
<u>Verizon Trouble Ticket Number</u>	PACW02WKK4
<u>Customer Reference Number</u>	V0469402
<u>Received Date and Time</u>	08/26/21 03:14:00 PM
<u>State</u>	PA
<u>Trouble Narrative</u>	NO DT AT NID- OUT,ATTEMPT CLOSEOUT OR SEND OUTKATH LEEN
<u>Media</u>	VTAG

Trouble Ticket Status Progression	
<u>Status Date and Time</u>	<u>Trouble Ticket Status</u> 
08/27/21 12:19:00 PM	CLOSED

Trouble Ticket Close Information	
<u>Trouble Cause Description</u>	447 - N/A
<u>Trouble Disposition Description</u>	0473 - Common Circuit Pack
<u>Last Cleared Date</u>	08/27/21 11:47:00 AM
<u>CloseOut Narrative</u>	707DB0REQ VER FLO OUTSIDE PLANT DIGITAL LOOP CARRIER / PAIR GAIN COMMON CIRCUIT PACK PG SYS FAIL

Customer Information	
<u>Customer Name</u>	BABYAK,KATHLEEN C
<u>Service Name</u>	-
<u>Service Address</u>	149 OAK RIDGE RD BULLSKIN
<u>Service Location</u>	-
<u>Reported By</u>	BROOKE MORAN
<u>Reported Service</u>	-
<u>Last Cleared Date</u>	Aug 27, 2021 06:47:00 AM
<u>Number of Calls</u>	-

Note: All times displayed on this page are in Eastern Time.



08/26/2021	02:15 PM	IP
08/26/2021	02:14 PM	ATC
08/26/2021	02:14 PM	AT
08/26/2021	02:14 PM	AUTOSCR
08/26/2021	02:14 PM	PENDSCR

Technician's Notes to the Customer	
<u>Date and Time</u>	<u>Technician's Notes to the Customer</u>
08/26/2021 02:28 PM	ESCALATION LEVEL 1 DENIED BY ESC MAN;8003283920; REASON: COMMITMENT BACKDOWN; NEW COMMIT 8/27
08/26/2021 02:14 PM	ESCR RECVD

**BCS Informal Complaint Decision - Babyak**



Pennsylvania Public Utility Commission

## BUREAU OF CONSUMER SERVICES

Case Search | Case Opened | Case Closed | Reports  
Data | Misc. | Contact Us | Logout  
CL-Customer Details | CL-Case Details I | CL-Case Details

II | View For Printing

Welcome to - Case Closed - Print

Case#: 3775768

Utility Name: Full Service Network (CLEC)  
Decision Issue: No  
Oral/Written: O  
Violation: ACTUAL  
Chapter 56/64/Other: TITLE66  
Section/Rule: .1501  
Total Balance: \$88.89  
Closing Date: 01/04/2021  
Resolution: Verbal Close: Customer Kathleen Babyak returned call. Reviewed complaint and Company report with customer. Customer confirmed that a box was replaced outside her house after the PUC complaint was filed, but she has had multiple issues since then. Customer was still very upset with Company and would like the lines replaced for a permanent fix. Informed customer that FSN provides her service but Verizon is responsible to maintain the lines. Informed customer that the PUC cannot permanently fix her issues at the informal level and referred her to formal complaint process. Customer understood and thanked PUC for helping. Customer gave permission to close the case.

Service Restored Pay(Offs): \$0.00  
Account Balance Date: 12/02/2020  
Keep Service on Pay(Remedys): \$0.00  
By:  
Terms:Begining  
Special Budget/Opt Payment: \$0.00  
Regular Budget Amount: \$0.00  
Plus Pay Toward Arrears: \$0.00  
Final Monthly Pay: \$0.00  
Current Monthly Pay: \$0.00  
End of Month Payment: \$0.00

10 Day/Reconnect Pay: \$0.00  
Begin with Bill Date:  
Pay Current Bill Plus: \$0.00  
BCS Investigator: Nathan Prough

Letter Type:

Letter Head Date:

Customer Name: Kathleen Babyak

Account Number: 9003017097  
Service Address: 149 Oak Ridge Road, Acme, PA 15610  
Home Phone: (724)547-4097  
Work Phone:

You are presently logged into PUC/BCS Web Application as Full Service Network (CLEC)

# **ALJ Hearing Exhibit 1**



U.S. STEEL TOWER  
600 GRANT STREET FLOOR 30  
PITTSBURGH, PA 15219-2709



Payments Only: 1.800.220.1659 • Customer Service: 1.888.347.6000

3994000127 PRESORT PBPS001 <>  
[Barcode]

KATHLEEN BABYAK  
149 OAK RIDGE RD  
ACME PA 15610-1207

## SUSPENSION NOTICE ACCOUNT PAST DUE!

12/2/2020

### FOUR WAYS TO PAY

**Our records indicate that your account is past due. If payment is not received, your service may be interrupted. Please take a moment to check your records.**

If this notice was sent in error, we apologize in advance. Thank you for your attention to this important matter.

Pay by Mail	FULL SERVICE NETWORK P.O. Box 3495 Pittsburgh, PA 15230
Pay by Phone	1-800-220-1659 Check, Credit & Debit Card
Pay Online	go to <a href="http://fullservicenetWORK.com">fullservicenetWORK.com</a> and click "Online Payment"
Sign Up for Auto-Pay	Use the attached form

Account#: 900-3017097  
Suspension Date: 12-09-2020  
Account Balance: \$101.25  
Past Due Balance: \$26.25

LPP  
10.32

All Other Inquiries: 1-888-347-6000



2  
→ why  
60.76

**PUC REQUIRED 7 DAY NOTICE:** Telecom services provided by us may be suspended on or anytime after the Suspension Date listed above if balance remains unpaid. Pending suspensions are for past due balances. If no additional deposit is listed then no additional deposit is required at this point. You should contact us immediately as there is a \$36.00 reconnection fee for accounts suspended. (\$26 for local portion and \$10 for the toll) Service will be suspended unless one of the following occurs: (i) Payment in full is received (ii) the grounds for suspension are otherwise eliminated (iii) a payment arrangement is entered and accepted by the Company (iv) a legitimate dispute is filed with FSN. The amount of past due basic service which must be paid in order to avoid the suspension of basic service is \$60.76. If you or anyone presently and normally living in your home is SERIOUSLY ILL WE WILL NOT CUT OFF YOUR TELEPHONE SERVICE for up to 30 days during such illness provided you: a.) Have a physician certify by phone or in writing that such an illness exists and that the person will be endangered if your telephone service is stopped AND b.) Make some equitable arrangement to pay your past due and current bills for service. Contact us immediately at the address or telephone number listed at the top of this notice to attempt to resolve this matter, to file questions, or to enter into a payment agreement.

## Enroll in Auto-Pay!

Please attach a voided check from your bank account.

Customer Name \_\_\_\_\_  
Email Address \_\_\_\_\_  
Name of Bank \_\_\_\_\_  
Bank Account Number \_\_\_\_\_

With Auto-Pay from Full Service Network, you can have your monthly invoice automatically deducted from your checking account.



I authorize Full Service Network to originate an electronic transfer or to draw a check against the account listed above in the amount of my monthly invoice on or about the due date of each monthly invoice on a recurring basis until I notify Full Service Network otherwise in writing.

Customer Signature X \_\_\_\_\_ Date \_\_\_\_\_

Don't forget to attach a voided check!

ALJ Ex 1